

In The United STATES District Court
For The District OF Delaware.

James W. Riley,

Plaintiff

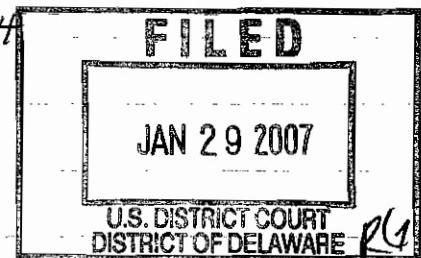
vs.

Stanley Taylor, et al.,

Defendants.

C. A. No. #06-01-Gms

Rule 34



Production OF Documents

Now Comes the plaintiff James W. Riley pursuant ^{Seconⁿd} to Rule 34 of the F.R.C.P. herein below requests the following documents for trial and any potential appeal:

1. The attached newspaper article identify "court documents obtained by The News Journal" and a "sworn deposition" recently given by defendant Stanley Taylor in a wrongful death lawsuit. Plaintiff direct the defendant Taylor or his attorney to provide copies of all documents, sworn statements and testimony given by defendant Taylor under oath at aforementioned deposition hearing and which were filed in court. These documents shall bear the date, time and location they were created and for what purpose they were utilized.

2. Provide plaintiff a complete copy of the recent settlement agreement made between defendant Taylor and the United States Department of Justice to improve prison medical health care.

3. Provide plaintiff with a complete copy of his medical records from 1995 to the present date. These medical records in the possession of the medical defendants contain pertinent information relating to when plaintiff originally fractured his right ankle in 1995 and had surgery followed by physical therapy. Also these records bear copies of the initial sick call complaint plaintiff filed with the medical staff in 2002 regarding his rectum dysfunction.

4. Provide plaintiff with a copy of defendants' Correctional Medical Services, Inc. (CMS) and First Correctional Medical, Inc. (FCM) insurance policy and name of their insurer's company. These documents shall reflect how much money CMS and FCM are insurer against for liability of lawsuits.

These documents will assist plaintiff with the prosecution of this civil action case at any potential trial or subsequent appeal.

Wherefore the defendants shall provide the requested information in full within 30-days of receipt of this motion.

Date: Jan. 21, 2007

James W. Riley)

James W. Riley, pro se

Delaware Correctional Center

1181 Paddock Road

Smyrna, Delaware 19977

Defendant Stanley Taylor

SEE CREDIT LINE

Wed., Jan. 17, 2007

Deposition: Prison chief admits not eyeing care

Taylor estimates inmate deaths
at a fraction of actual totals

By LEE WILLIAMS and ESTEBAN PARRA
The News Journal

Correction Commissioner Stanley W. Taylor Jr. never personally investigated health care complaints lodged by inmates or their families, denied responsibility for overseeing the prison medical staff, and grossly understated the number of inmates who died during the latter part of his tenure, according to court documents obtained by The News Journal.

Taylor was recently deposed under oath, in one of the numerous wrongful death lawsuits filed against him, his department and the state, on behalf of an inmate who died in state custody.

Many more lawsuits are pending, attorneys say.

Lawmakers and civil rights advocates say the next person to head the Department of Correction should be more engaged, more concerned with inmate care, and more involved in the day-to-day operations of the department than Taylor, who ran the prison system for 11 years.

They hope former state Attorney General Carl C. Danberg, whose nomination to replace Taylor is to be debated today in the Senate, will be more accessible and accountable.

"I want a commissioner who is passionate, who has a keen sense of justice, who's hands on without micromanaging," said state Sen. Karen E. Peterson, D-Stanton. "I want somebody who cares about human beings, who will



**Stanley W.
Taylor Jr. will
retire Feb. 1
after 11 years
as correction
commissioner.**

INSIDE

24-year-old
inmate's death
shocks his
family. A9

See PRISONS — A9

Read News Journal series on prison
health care and watch a video interview
with defendant Taylor at www.delawareonline.com.

Certificate of Service

I, James Riley, hereby certify that I have served a true and correct cop(ies) of the attached: Production of Documents upon the following parties/person (s):

TO: Kevin J. Connors
1220 N. Market St., 5th fl.
P. O. Box 8888
Wilmington, Delaware
19899-8888

TO: _____

TO: Ophelia M. Waters
Deputy Attorney General
Department of Justice
820 N. French Street
Wilmington, Dela. 19801

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 23 day of January, 2007

James Riley